

STAVROS

CENTER FOR INDEPENDENT LIVING, INC.

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February 25, 1998

MM Docket 95-176

Further Notice of Proposed Rule Making

Office of the Secretary
The Federal Communication Commission
1919 M Street NW
Washington DC 20054

To The Federal Communication Commision:

We submit these comments for the Commission's review on the Further Notice of Proposed Rule Making, MM-Docket 95-176, released on January 14, 1998. Stavros, Center for Independent Living, have serve the disability community for over twenty years in western Massachusetts. We, Lorna Laferriere, Director of Deaf Services and Jeannette Costa, Deaf Community Advocate have worked to great length with the Deaf and Hard of Hearing Community for over seven years. The Stavros Center for Independent Living have served as a resource to other community leaders that have tried to improve the quality of closed captions. We have provided information to local television stations and continue to be involved by providing feedback. One area that have concern us for some time has been the area of emergency information. We are painfully aware of the safety hazzard and fear that deaf and hard of hearing people have experienced due to lack of captions for emergency information.

We would like to see live reports and late breaking news been caption. We believe this is possible by using current technology such as speech recognition or cart reporters from a remote location. Although neither of these are requiered we believe they are options that could work in providing access. Speech recognition technology is advancing rapidly, and cart reporters are readily available. We believe that with the advances of technology CART reporters do not need to be at the studio in order to caption the news. They can be at a remote location and still caption live local reports during emergencies. We also agree with the commission that open visual scrawls, open captions slides are method that are readily available. This option if used properly would provide deaf and hard of hearing viewers some access that they currently do not have. We believe this option is readily achievable and currently in place at many television stations.

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Because, this options are currently in place in many television stations, we do not believe that the commission should provide a schedule to begin captioning. We asked that the commission consider the potential danger an emergency situation would pose in a significant portion of the population. For people without hearing disabilities information is readily available through radio. For people with hearing disabilities this information can only come from the television or from friends and family members. We strongly believe that caption of emergency information should be a priority. Should be immediate. No schedule should be impose on this since the lives of millions of americans depend on it. People with hearing disabilities have waited enough. They have waited patiently for technology to develop and for people to listen to their concerns. The time is right, the time is now. Not eight years from now and not a couple of years plus an extention due to money constraints. It is amazing to us that the government can put a man on the moon or send a spaceship to Mars yet closed captioning emergencies is imposible.

There are ways of providing closed caption during emergency situations. The main concern should be how to make sure this measures are adopted. Open visual scrawls are currently been used to provide sports information to all viewers without interrupting the program in progress. This can be used in the same manner to insured up to date emergency information or late breaking news. We believe that this method will not imposed a constraint in television and cable broadcaster

It is true that the ENR leaves substantial portions of the news uncaptioned. Specially in late breaking news and storm warnings. However, news or emergency information is of vital importance to all, not to just a few. ENR can be used to insured that whatever, is known by the providers of news is communicated. We would like to have at least some information past on to us while we wait for the whole story to be known. The use of ENR should not be an excuse for limiting information. For example; if the news broke at 5:00am we expect that by the 7:00 am newsbroadcast some information be available. Eventhough, it may not be exactly what the person at the live report area is saying.

We also would like to do without "Screen Shrinking". When winter stroms come and cancelations are taking place, we would like to see the national shows if we choose to. In many situations local channels will shrink the screen to pass cancelations this severely hinders our ability to see national news. In situations the captions for national shows are completely ommitted in order to show school cancelations. This is not equal access. Hearing people can still see and hear their show while we are stuck with cancelations.

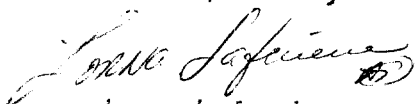
We also believe that money should not be the sole determinant of when to provide captions in emergency situations. Captions of this nature have to be provided, regardless of cost. What is more important the lives of millions of americans with hearing disabilities or a few dollars saved by million dollar video program providers?

We also, would like for the Commission to make their regulation a standard for all. Regardless, of company size, captions to emergency information should be provided. We understand that some small companies may not have access to large amounts of monies. However, we would like to argue that cost will soon decline as more video program providers acquire the necessary technology to provide captions. We also would like to argue that as captions are used more the solutions would be found to the provision of emergency information. This would not happen unless video program providers start using the technology.

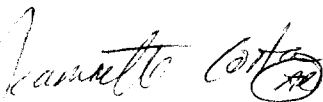
There should not be a limit/benchmark as to how much caption would be provided. If emergency information needs to be broadcast this should not prevent the video program providers from captioning other things.

We in western Massachusetts have lived through serious crisis. Trucks containing nuclear waste have spilled on major access roads, tornado warnings, school floods, and winter storms. We know how important captions for emergencies are. We have been scared, we have feared for our safety and that of our children. We seen how people have been evacuated for safety reasons without any idea as to what is happening until days or weeks later. We depend on captions sometimes for our survival. We are tired of waiting. We would like the Commission to regulate and mandate captions for emergency information without delay.

We respectfully submitt these comments,



Lorna Laferriere,
Director of Deaf Services



Jeannette Costa
Deaf Community Advocate